



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
OREGON OPERATIONS OFFICE  
805 SW Broadway, Suite 500  
Portland, Oregon 97205

April 27, 2011

Mr. Bob Wyatt  
Northwest Natural & Chairman, Lower Willamette Group  
220 Northwest Second Avenue  
Portland, OR 97209

Re: Portland Harbor Superfund Site; Administrative Order on Consent for Remedial Investigation and Feasibility Study; Docket No. CERCLA-10-2001-0240

Dear Mr. Wyatt:

EPA has reviewed the Feasibility Study (FS) Tools memoranda that were submitted by the Lower Willamette Group (LWG) in March 2011. This letter provides EPA's comments on the following FS Tools memoranda:

- *Mitigation Determination Approach for Use in the Feasibility Study* (March 15, 2011)
- *Draft Feasibility Study Costing Approach* (March 15, 2011)
- *Treatment Technology Evaluation Tools* (March 15, 2011)
- *Dredging Water Quality Evaluation* (March 31, 2011)
- *Draft Evaluation of "COCs" and Contaminant Mobility Evaluation Criteria for the Draft Feasibility Study* (March 16, 2011)

EPA has determined that the attached comments need to be addressed to complete the draft FS Report, and hereby directs the LWG to address the comments in the draft FS Report. For purposes of compliance with Section XVIII, Dispute Resolution, of the Administrative Order on Consent, the effective date of this directive will be June 22, 2011 if the LWG agrees to provide a status report by June 8, 2011 describing how the comments will be addressed in the draft FS Report.

EPA looks forward to our upcoming FS check-in meeting and the LWG's continued efforts to ensure that a draft FS Report is submitted by November 15, 2011. If you have any questions this matter, please contact Chip Humphrey at (503) 326-2678 or Kristine Koch at (206) 553-6705. All legal inquiries should be directed to Lori Cora at (206) 553-1115.

Sincerely,

Handwritten signature of Chip Humphrey in black ink.

Chip Humphrey  
Remedial Project Manager

Handwritten signature of Kristine Koch in black ink.

Kristine Koch  
Remedial Project Manager

Enclosures

cc: Greg Ulirsch, ATSDR  
Rob Neely, NOAA  
Ted Buerger, US Fish and Wildlife Service  
Preston Sleeper, Department of Interior  
Jim Anderson, DEQ  
Kurt Burkholder, Oregon DOJ  
David Farrer, Oregon Environmental Health Assessment Program  
Rick Keppler, Oregon Department of Fish and Wildlife  
Michael Karnosh, Confederated Tribes of Grand Ronde  
Tom Downey, Confederated Tribes of Siletz  
Audie Huber, Confederated Tribes of Umatilla  
Brian Cunningham, Confederated Tribes of Warm Springs  
Erin Madden, Nez Perce Tribe  
Rose Longoria, Confederated Tribes of Yakama Nation